

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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ROBERT P. GOODRICH,	)	
	)	
Petitioner,	)	
	)	
v.	)	Civil Action No. 03-12541-NG
	)	
TIM HALL,	)	
	)	
Respondent.	)	
	)	

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**PETITIONER'S MOTION FOR ENLARGEMENT OF TIME  
TO FILE MEMORANDUM IN SUPPORT OF ISSUANCE OF  
WRIT OF HABEAS CORPUS  
(ASSENTED-TO)**

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Petitioner Robert P. Goodrich ("Petitioner") hereby moves that the Court enlarge the time for filing his Memorandum in Support of Issuance of Writ of Habeas Corpus for an additional four days, to and including Friday, July 23, 2004. As grounds therefor, Petitioner states that he presently seeks relief from a minimum ten-year sentence, and requests that this Court provide him with additional time to comprehensively research his arguments in his Memorandum. In further support of his motion, the Commonwealth has assented to the requested enlargement of time. Petitioner agrees to extend the current deadline under the parties Joint Briefing Schedule for Respondent to file his opposition memorandum for an additional week, to and including August 27, 2004.<sup>1</sup> In further support of this motion, the Petitioner states that the current September 3, 2004 deadline for filing his reply memorandum will not change, and therefore the

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<sup>1</sup>Pursuant to this Court's allowance of the parties Joint Motion for Briefing Schedule on July 2, 2004, the current deadlines for Petitioner's memorandum and Respondent's opposition are July 19, 2004 and August 20, 2004, respectively.

deadline for completing briefing will remain the same even as the result of Petitioner's requested extension.

Respectfully submitted,

ROBERT P. GOODRICH,  
By his attorneys,

  
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Dated: July 19, 2004

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that on July 19, 2004, I did confer in good faith, via telephone, with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion, and counsel for Respondent has indicated that she assents to this motion.

  
Jill L. Brenner